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HOME

BEER

WINE

DISTILLED SPIRITS

OTHER ALCOHOL

TOBACCO

FIREARMS & AMMUNITION

About TTB

Advertising

Careers

EEO

FAQs

FOIA

Forms

Formulation

Importers

International Trade

Labeling

Laboratory

National Revenue Center

Student Research

Trade Practices

Tutorials and Job Aids

Wholesalers

Language Links

En Español

En Français

漢語

Italiano

Get Adobe Acrobat Reader



Certificate of Label Approval (COLA) Streamlining Accomplishments and Long-term Initiatives

We are excited to share with you some news about our COLA review process streamlining efforts and some of the changes we have planned for the coming months and years.

[Certificate of Label Approval \(COLA\) Streamlining Efforts](#) (02/29/2012)

We welcome your feedback on how we may improve our processes. Please [send us an email](mailto:streamlineefforts@ttb.gov) (streamlineefforts@ttb.gov) with your comments or suggestions regarding our COLA streamlining efforts.

COLA STREAMLINING ACCOMPLISHMENTS

We have been working to streamline our COLA review process. To date, we—

- [Created a new email address so you can send us suggestions about how we can improve the COLA process](#)
- [Are no longer reviewing labels for type size requirements and certain image file-related issues](#)
- [Amended personalized label guidance to allow industry members to make certain additional changes without resubmitting labels for approval](#)
- [Simplified COLAs Online by implementing Formulas Online](#)
- [Updated labeling FAQs at TTB.gov](#)
- [Made application turnaround times available to industry](#)
- [Reduced non-compulsory services to speed up review times](#)
- [Met with other Federal government agencies that review labels to discuss best practices](#)

LONG-TERM INITIATIVES

In addition to our recent accomplishments, we have set some long-term goals that will help us significantly reduce the amount of time it takes us to review labels and, in turn, the time needed to get compliantly labeled products into the marketplace. In the coming months and years, we plan to—

- [Revise our labeling regulations](#)
- [Modify COLAs Online](#)
- [Begin processing both electronic and paper COLA applications electronically](#)
- [Update the COLA form](#)
- [Continue collecting comments and suggestions](#)

Did You Know...?

We received over 146,000 alcohol beverage label applications in 2011, which was up from over 134,000 applications in 2010.

While the demand for alcohol beverage label approvals has increased significantly over the past several years, we continue to evaluate COLA applications as quickly and as accurately as possible. Our goal is to ensure all alcohol beverage products in the U.S. marketplace comply with our labeling regulations (mandated under the Federal Alcohol Administration Act) in Title 27 Code of Federal Regulations:

- [Part 4 \(Wine\)](#)
- [Part 5 \(Distilled Spirits\)](#)
- [Part 7 \(Malt Beverages\)](#)
- [Part 16 \(Government Warning\)](#)

COLA STREAMLINING ACCOMPLISHMENTS

- **Created a new email address so you can send us suggestions about how we can improve the COLA process**—We started receiving comments and suggestions from alcohol beverage industry members on how we can improve our label review process in August 2011. We have already implemented some of the suggestions we have received and have plans to implement others in the coming months. The following list includes some of the suggestions and the actions we have taken or plan to take regarding them.

Industry Suggestion: When TTB returns a COLA application for corrections, the industry member has 15 days to make the necessary changes and resubmit the application, or TTB automatically rejects it. Industry members have requested that we extend this period to 30 days.

TTB Response: We will implement this change and anticipate this upgrade will take place in mid-Summer 2012.

Industry Suggestion: Accept .pdf and Microsoft Word files for label submissions in COLAs Online.

TTB Response: Unfortunately, there are two reasons why industry may not submit .pdf or Word files as label images. First, these types of files will not display as part of the printable version of the approved COLA, which utilizes HTML formatting. Second, these types of files often do not provide adequate image quality for us to evaluate if a label complies with the labeling regulations. However, we do accept .pdf and Word files as additional attachments.

Industry Suggestion: Accept a file size larger than 450KB for label images.

TTB Response: We plan to increase the file size for label images in COLAs Online and are currently determining the exact file size limit (it will probably be 750KB or 1MB). Our Information Technology staff will conduct testing to determine the appropriate file size. Once we implement this change, we will notify users via TTB.gov.

We encourage industry members to provide us with feedback on how we may improve our processes. To submit comments or suggestions regarding our COLA streamlining efforts, please send an email to streamlineefforts@ttb.gov.

[back to top](#)

- **Are no longer reviewing labels for type size requirements and certain image file-related issues**— We evaluate COLA applications to ensure that labels contain the mandatory information required by our regulations. Along with their label applications, industry members must submit label images for our review. In the past, when we reviewed electronically-submitted images, we often found minor legibility issues, which would not have been present on the actual labels.

In addition, we no longer routinely evaluate whether or not mandatory label information meets the specified type size requirements. We published [Industry Circular 2011-4, Streamlining the Certificate of Label Approval Process](#) in April 2011 to address these issues.

These changes promote the most efficient use of our resources without reducing consumer protection. They also decrease the number of applications we return for correction, resubmission, and re-review.

[back to top](#)

- **Amended personalized label guidance to allow industry members to make certain additional changes without resubmitting labels for approval**— We issued guidance on personalized labels ([TTB G 2011-5](#)) in September 2011, which permits certificate holders to make changes to the graphics or artwork on a previously approved personalized label without having to apply for a new COLA. Personalized labels contain personal messages, pictures, or other artwork specific to the consumer who is purchasing the product.

[back to top](#)

- **Simplified COLAs Online by implementing Formulas Online**— We made changes to COLAs Online in August 2011. We created Formulas Online to give industry an easier way to draft, submit, and track formula and sample submissions for alcohol beverages and nonbeverage products.

One benefit of Formulas Online is that users who are also registered for COLAs Online can access the two systems via a single user ID. This connection means that industry members who are registered for both systems can link formula submissions to COLA applications; this reduces the need for industry members to supply copies of their formulas when they submit applications through COLAs Online.

[back to top](#)

- **Updated labeling FAQs at TTB.gov**— We continue to update our [Labeling FAQs](#) on TTB.gov. We revised four FAQs in August and September 2011, including those that deal with application turnaround times, informal label reviews, status checks on submitted applications, and personalized labels. These updates, along with the rest of the labeling FAQs, help industry to better understand the COLA process.

We update our FAQs based on how frequently we receive similar questions from industry. If we receive enough inquiries about a topic, we look to see if we have an FAQ that we need to update, or we create a new FAQ if there is none. We also have internal procedures that require us to review and revise, if necessary, all Bureau-issued public guidance, including FAQs, three years from their issuance dates.

[back to top](#)

- **Made application turnaround times available to industry**— We began publishing average turnaround times for the processing of label applications for each commodity in July 2011. We believe that it is important to provide this information to industry members to aid in business planning. This information is available on the TTB.gov [Labeling page](#) and on our Advertising, Labeling and Formulation Division telephone message, which you may hear by calling 1-866-927-2533 (press “4” for malt beverages and distilled spirits, or press “6” for wine).

[back to top](#)

- **Reduced non-compulsory services to speed up review times**—[In a February 2011 announcement](#) about expedite and informal label and formula review requests, we stated that in order to speed up review times we no longer informally review labels and more closely examine expedite requests to ensure that they qualify for "expedited review."

By reducing these non-mandatory services we can dedicate our resources to evaluating labels in the order that we receive them.

[back to top](#)

- **Met with other Federal government agencies that review labels to discuss best practices**—Beginning in October of 2011, we met with other Federal agencies that preapprove labels for food products. Among these agencies were the U.S. Department of Agriculture, Food Safety and Inspection Services, Labeling and Program Delivery Division; and the U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Seafood Inspection Service.

Through these meetings, we learned about processes that have helped to provide better customer service within these agencies. We hope to use this knowledge to help reengineer our label approval process.

[back to top](#)

LONG-TERM INITIATIVES

- **Revise our labeling regulations**—We are drafting rulemaking that will modernize parts 4, 5, 7, 13, and 16 of our regulations in order to update the regulations to reflect current industry practices and to make them easier to read and more useful. The net effect of the changes is to improve compliance and efficiency.
- **Modify COLAs Online**—We have begun discussing possible modifications to COLAs Online. These changes would expand upon the system's current functionality and help us to review labels more quickly. We expect that these improvements would significantly reduce the time it takes for industry to receive COLAs, and it would also help us to meet our statutory mandate to ensure products are labeled properly.
- **Begin processing both electronic and paper COLA applications electronically**—Beginning in June 2012, we plan to start scanning all paper label applications and uploading them to a virtual file room, so label specialists may review them electronically. The virtual file room also will allow us to communicate electronically with any industry member who provides an email address on a paper application.

For example, industry members will receive email updates as to the status of their applications. This system will streamline the COLA process by allowing us to more quickly communicate with alcohol beverage industry members throughout the COLA application process.

- **Update the COLA form**—We are in the process of updating the COLA form, [TTB Form 5100.31, Application for and Certification/Exemption of Label/Bottle Approval](#). We are revising the COLA form, in part, to streamline the COLA application and review process and to remove impediments without compromising our mandates under the Federal Alcohol Administration Act.

In a [Federal Register notice](#), we propose the following changes to the COLA form:

- In the application portion, we propose to eliminate the requirement that industry members must show wording on caps, seals, and other materials firmly affixed to the container;
 - In the second and third pages of the form, we propose to update the instructions for completing the form and the conditions of approval; and
 - We propose additional circumstances that would allow holders of approved COLAs to modify approved labels without submitting new COLAs.
- **Continue collecting comments and suggestions** – We plan to continue collecting comments and suggestions via streamlineefforts@ttb.gov from interested alcohol beverage industry members regarding our COLA streamlining efforts. From these submissions, we hope to learn how TTB can continue streamlining its COLA review process while fulfilling its statutory mandates under the Federal Alcohol Administration Act.

[back to top](#)